IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

CYNTHIA ANDERSON 7522 Tullymore Road Dublin, Ohio 43016	:	
Plaintiff,	:	Civil Action No: 3:17-cv-783
vs.	:	Judge:
SHEA MCGREW, Vice President for University Advancement Bowling Green State University Mileti Alumni Center Alumni Drive Bowling Green, Ohio 43403	:	
Defendant.	:	

COMPLAINT
(Jury Demand Endorsed Hereon)

Plaintiff Cynthia Anderson, by and through the undersigned counsel, hereby asserts as her Complaint against Defendant, states and avers the following:

I. Parties and Jurisdiction

1. At all times pertinent hereto, Plaintiff Cynthia Anderson ("Anderson" or "Plaintiff") was employed by Bowling Green State University ("BGSU") as the Assistant Vice President for Major Gifts - University Advancement and was directly supervised by Defendant Shea McGrew ("Defendant" or "McGrew");

2. McGrew is being sued in his official and individual capacity and is employed by Bowling Green State University, a State of Ohio public university pursuant to Section 3341.01 of the Ohio Revised Code;

3. All of the relevant acts alleged in this Complaint take place within the geographic jurisdiction of this Court;

4. This action asserts federal claims under 42 U.S.C. § 1983 and 42 U.S.C. § 1988 for deprivation of Plaintiff's property interest without the procedural due process guaranteed by the Due Process Clause of the Fourteenth Amendment to the United States Constitution;

5. This Court has jurisdiction of the federal claims pursuant to 28 U.S.C § 1331;

6. Venue with this Court is proper pursuant to 28 U.S.C § 1391;

II. Factual Allegations

7. Plaintiff realleges Paragraphs 1 thought 6 here as if fully set forth herein;

8. Anderson was first employed by BGSU starting on October 5, 2015;

9. During her term of employment with BGSU, Anderson's performance was highly rated;

10. Anderson was never provided with any sort of corrective action or placed on a performance improvement plan during her employment with BGSU;

11. On August 22, 2016, Anderson was informed by BGSU that her employment was terminated;

12. As an employee of a State of Ohio public university, Anderson enjoyed a property right in her public employment;

13. BGSU has an administrative staff handbook that sets forth certain employee rights, benefits, and privileges.

14. Anderson was not provided with sufficient due process prior to or after the termination of her public employment;

III. LEGAL CLAIMS

15. Plaintiff realleges Paragraphs 1 thought 14 here as if fully set forth herein;

16. Anderson enjoyed a property right in her public employment, which was terminated without sufficient due process;

17. As a direct and proximate result of her termination of employment and deprivation of her due process rights, Anderson has suffered damages, loss of employment and compensation in excess of $75,000.

WHEREFORE, Plaintiff Cynthia Anderson respectfully requests that this honorable Court grant the following relief:

1. Under all claims, an award of compensatory damages in an amount deemed just by a jury;
2. An award of past and future pecuniary loss;
3. An award of reasonable attorney's fees, costs and interest pursuant to 42 U.S.C. § 1983, as determined by the Court;
4. All available equitable remedies, to include reinstatement and restoration of compensation and benefits;

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Plaintiff requests that her claims be tried to a jury in accordance with the Federal Rules of Civil Procedure.

Respectfully Submitted,

ARENSTEIN & ANDERSEN CO., LPA

By: /s/ Nicholas I. Andersen
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